

Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

RECEIVED & INSPECTED  
AUG 27 2002  
FCC - MAILROOM

In the Matter of )  
 )  
Amendment of Section 73.202(b), )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Harper, Kansas - Enid, Oklahoma) )  
 )  
TO: Audio Division, Media Bureau

MM Docket No. \_\_\_\_\_  
RM- \_\_\_\_\_

**PETITION FOR RULE MAKING**

Cobra Communications, Inc. ("Cobra"), by its attorney, hereby respectfully requests the Audio Division, Media Bureau, to issue a Notice of Proposed Rule Making, proposing the following changes to Section 73.202 of the Commission's Rules and Regulations, the Table of FM Allotments:

Present:

Harper, Kansas	****
Enid, Oklahoma	Channels 245C, 276C2

Proposed:

Harper, Kansas	Channel 244A
Enid, Oklahoma	Channels 245C0, 276C2

In support thereof, it is alleged:

No. of Copies rec'd 015  
List ABCDE MB

02-224

**I. Harper, Kansas:**

1. Petitioner requests the FCC to amend the Table of FM Allotments to add Channel 244A to the community of Harper, Kansas, as that community's first local service. Information concerning the characteristics of that community are attached and marked Exhibit A. Harper, Kansas, has a population of 1567 persons (2000 Census). It is incorporated and its affairs are administered by a mayor and eight councilmen. It has nine churches and numerous businesses. It has its own fire department, police department and ambulance service. Therefore, Harper, Kansas, is clearly a community of substantial size, deserving a first local broadcast service.

**II. Compliance with the Rules:**

2. Attached and marked Exhibit B is a tabulation, showing that Channel 244A can be allotted to Harper, Kansas, in full conformity with all of the Commission's Rules and Regulations. The allotment requires that FM Station KMMZ, Enid, Oklahoma, be treated as a Class C0 facility. However, while Station KMMZ is presently classified as a Class C facility, it currently operates with Class C0 facilities. Thus, it can and should be reclassified as a Class C0 allotment.

3. Attached and marked Exhibit C is a map, showing that from the reference coordinates, a city grade 3.16 mv/m or better signal will be provided to the entire community of Harper, Kansas. Therefore, the proposed allotment complies with all of the requirements of the Commission's Rules and Regulations, including city coverage.

**III. Expression of Interest:**

4. If the Table of FM Allotments is amended to add Channel 244A to the community of Harper, Kansas, petitioner will apply for a construction permit for the facility and, if granted a construction permit, petitioner will promptly put the station on the air in the public interest. If it

becomes necessary to bid for the construction permit at auction, petitioner will participate in the bidding and endeavor to purchase the construction permit. Similarly, if the petitioner purchases the construction permit at auction, petitioner will follow through; construct the station; and place it in operation in the public interest.

WHEREFORE, it is respectfully requested that the Table of FM Allotments be amended to allocate Channel 244A to the community of Harper, Kansas.

Respectfully submitted,

COBRA COMMUNICATIONS, INC.

August 26, 2002

Law Office of  
LAUREN A. COLBY  
10 E. Fourth Street  
P.O. Box 113  
Frederick, MD 21705-0113

By: 

Lauren A. Colby, Esq.  
Its Attorney

## EXHIBIT A



# Harper, Kansas



Population: 1,567 (2000)  
Latitude: 37 17' 12" N  
Longitude: 98 1' 32" W  
Elevation: 1330  
School District: USD 361  
Zip Code: 67058  
Area Code: 620

Located in north central [Harper](#) [HP] County, Harper is, strangely enough, not the county seat. Even though it lacks a courthouse it has wide shady streets and many beautiful turn-of-the-century homes.

At the main downtown intersection of Central & Main, the old fountain has been restored. It served the citizens of Harper from 1909 to 1969. When it was originally presented to the town by a group of ladies, it cost \$365.

North of the downtown area between Seventh Street and the tracks is the old brick AT&SF station. It still seems to be used by the railroad for maintenance work. I was struck by the size of the area that the station complex took up; look at the old concrete walls that define it.

Highway [US 160](#) and the Santa Fe railroad run east-west through Harper. K-14 runs along the west side of town, leading north into [Kingman](#) county, and K-2 runs northeast to Wichita.

## History

Sgt. Marion Harper was killed in 1863 in a Civil War battle in Arkansas. Both the town and the county are named for him.

## Interesting Places in Harper

- The old [Runnymede church](#), now in Harper.
- The Harper train station, 7th Street
- The Martha Kiefer House (1907), Central & US-160
- The [Old Harper Fountain](#), Central & Main
- The [old red barn](#), East Main

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**Harper Chamber of Commerce**  
(620) 896-2511  
201 W. Main  
Harper, KS 67058

Get back on  explore [Harper County](#), or visit other [Kansas Cities & Towns](#)

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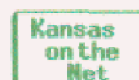
*August 14, 2001 / John & Susan Howell / [Wichita, Kansas](#) / [howell@kotn.org](mailto:howell@kotn.org)*

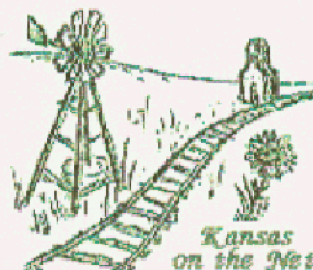
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## Businesses of Harper, Kansas



[Main](#)  
[Churches](#)  
[Education](#)  
[Government](#)  
[Health Care](#)  
[Library](#)

- Automotive** **Joe's Service** 896-2904  
 East 14th / Harper, Kansas 67058  
**Mr. Incs Car Wash** 896-7910  
 West 14th / Harper, Kansas 67058  
**Bobby Lubber's Auto Group** 1-620-896-7344  
 P.O. Box 66 / Harper, Kansas 67058  
**Hostettler Sales** 1-620-896-2991  
 423 East 14th / Harper, Kansas 67058  
**Anthony Farmers COOP Service Station** 1-620-896-7376  
 203 East 14th / Harper, Kansas 67058  
**Wedman Ford** 1-620-896-7346  
 1201 West Main / Harper, Kansas 67058  
**A & A Auto Suply** 1-620-896-7949  
 415 East 14th / Harper, Kansas 67058
- Banking** **American Bank** 896-7317 / 1002 Central  
**Freeport State Bank** 896-7391 / 807 W. 14th
- Dining** **Country Creamery Ice Cream Parlor** 896-2761 / Hwy 160  
**D & J Drive In** 896-2057 / 609 E. 14th  
**D'Mario's Pizza** 896-2414 / 720 W. 14th  
**Hunger House** 896-2874 / W. Hwy 160  
**Jo's Place** 896-2943 / 522 W. 14th  
*Open Mon-Sat 9 am-9 pm; Closed Sundays*
- Lodging** **Harper Motel** (620) 896-9977  
 522 West 14th / Harper, Kansas 67058
- Newspaper** **Harper Advocate** (620) 896-7311  
 907 Central / Harper, KS 67058
- Shopping** **Bob's AF Super** 896-2705 / 406 E. 14th  
**Ricke's Home Center** 896-2924 / 1303 Monroe  
**Sav-A-Trip West** 896-7179 / 14th & Central  
**Village Green** 896-7106 / 1403 Central *Gifts & Candles*

**Harper Chamber of Commerce**  
(620) 896-7106  
201 W. Main / Harper, KS 67058

Explore [Harper](#) & [Harper County](#), or visit other Kansas [Cities & Towns](#)

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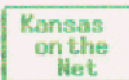
*July 16, 2002 / John & Susan [Howell](#) / [Wichita, Kansas](#) / [howell@kotn.org](mailto:howell@kotn.org)*

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*Christian Church*

## Churches Of Harper



**Calvary Bible Baptist Church**  
(620) 896-2161  
905 Pine

**Chicaskia Baptist Church**  
(620) 896-2277  
Rt. 3

**Christian Church**  
(620) 896-2461  
321 East Main

**Church of Christ-Eastside**  
(620) 896-2033  
Main & Monroe

**Community Bible Church**  
(620) 896-7128  
612 East 12th

**Cornerstone Baptist Church**  
(620) 896-2385  
615 Central Ave

**Pleasant Valley Mennonite Church**  
(620) 896-2004  
East Highway 160

**Presbyterian Church**  
(620) 896-2332  
1202 Central

**United Methodist Church**  
(620) 896-2952  
East Highway 160

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**Harper Chamber of Commerce**  
(620) 896-2511  
201 W. Main / Harper, KS 67058

Explore [Harper](#) & [Harper County](#), or visit other Kansas [Cities & Towns](#)

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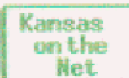
*February 26, 1999 / John & Susan Howell / Wichita, Kansas / [howell@kotn.org](mailto:howell@kotn.org)*

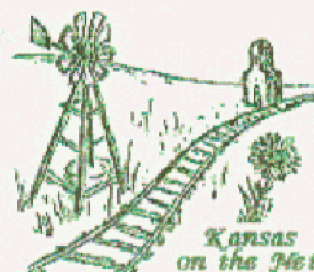
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## Education In Harper



[Businesses](#)

• [Public Schools](#)

[Churches](#)

[Education](#)

[Government](#)

**USD 361 Anthony, Harper**

124 N. Jennings / Anthony, KS 67003

[Health Care](#)

[Library](#)

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**Harper Chamber of Commerce**

(620) 896-2511

201 W. Main / Harper, KS 67058

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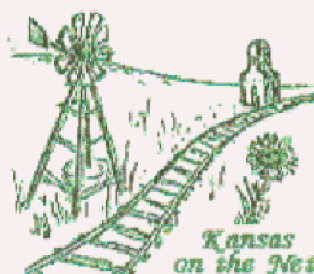
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## City Of Harper



**Emergency - 911**

[Businesses](#)

[Churches](#)

[Education](#)

[Government](#)

[Health Care](#)

[Library](#)

• **City Offices**

- **Ambulance Service** / 1204 Maple
- **City Barn** (620) 896-2038 / Route 3
- **City Clerk** (620) 896-2511 / 201 W. Main
- **FAX** (620) 896-7832
- **Fire Department** (620) 896-2511 / 201 W. Main
- **Police Department** (620) 896-2853 / 201 W. Main
- **Public Library** (620) 896-2959 / 1002 Oak
- **Swimming Pool** (620) 896-2180 / 808 W. Main

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**Harper Chamber of Commerce**  
(620) 896-2511  
201 W. Main / Harper, KS 67058

Explore [Harper](#) & [Harper County](#), or visit other Kansas [Cities & Towns](#)

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## Harper Public Library



(620) 896-2959 / 1002 Oak / Harper, KS 67058

### [Businesses](#)

### [Churches](#)

### [Education](#)

### [Government](#)

### [Health Care](#)

### [Library](#)

#### • **Hours**

Monday 1:30-8:00  
Tuesday 9:00-12:00 & 1:30-5:30  
Wednesday 1:30-8:00  
Thursday 1:30-5:30  
Friday 1:30-5:30  
Saturday 9:00-1:00

#### • **Services**

Interlibrary Loan   Films  
Cassettes   Talking Books  
Magazines   Bookmobile

#### • **Children's Activities**

- o Story Hour - Tuesdays at 10:00 - September to May
- o Summer Reading Program

#### • **Staff**

- o Brenda Minnia, Librarian
- o Connie Robinson, Assistant Librarian

#### • **Harper References**

- o WPA *The WPA Guide to 1930s Kansas* ( Lawrence: University Press of Kansas. 1984 )
- o Sanders, Gwendoline & Sanders, Paul *The Harper County Story* (North Newton: Mennonite Press. 1966)

*Member, [South Central Library System](#)*

**Harper Chamber of Commerce**  
(620) 896-2511  
201 W. Main / Harper, KS 67058

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<http://skyways.lib.ks.us/towns/Harper/library.html>

8/16/02



County Seat: Anthony

Founded: 1873

Population:

• 6,536 (2000)

• 7,124 (1990)

• 10,310 (1900)

Area: 802 Square Miles

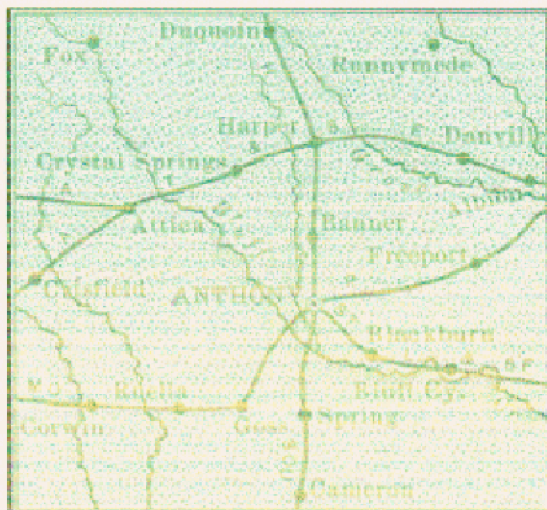
Standard Abbreviation: HP

## Harper County



*Harper County Courthouse*

### History



Organized in 1873. County seat Anthony. The organization of this county was one of the most glaring frauds ever perpetrated in the State. Attorney-General Williams, in his official report, says: "It is not pretended that Harper county ever had an inhabitant." The form of its organization was legal on paper, and that is all. In 1878 the organization became legal. The county was named in memory of Marion Harper, first sergeant of Company E, Second Regiment Kansas Cavalry. He was mortally wounded at Waldron, Ark., December 29, 1863, and died the following day. His comrades say he took his death coolly. When brought in wounded, he proposed a wager that in so many hours he would be dead; the bet was taken, and Marion Harper won.

Map and text from *History of Kansas*, Noble Prentiss, (Winfield: E.P. Greer. 1899)

One of the rail lines that served Harper County was the Hutchinson & Southern, a remarkable railroad built by a group of Kansas businessmen without spending any of their own money. It later became part of the A.T.&S.F.



William G. Cutler's *History of Kansas*, first published in 1883, tells about early Harper County.

There is a section on Harper County in the book *Kansas: a Cyclopedia Of State History* by Frank Blackmar (1912).

The Special Collections of the Ablah Library at WSU contain historical images of Anthony, Attica, Bluff City, Harper, & Waldron.

## Cities, Towns, & Villages of Harper County

Year	Elev	2000 Population	Name	ZIP
1878	1350	2,440	<u>Anthony</u>	67003
1884	1453	636	<u>Attica</u>	67009
1886	1240	80	<u>Bluff City</u>	67018
	1280		Corwin	
	1350		Crisfield	
	1440		<u>Crystal Springs</u>	
1880	1346	59	<u>Danville</u>	67036
1893	1582		Duquoin	
1885	1333	6	<u>Freeport</u>	67049
1877	1421	1,567	<u>Harper</u>	67058
	1254		Hawk	
	1314		Midway	
	1330		Ruella	
1889	1379	0	<u>Runnymede</u>	Gone but not forgotten
1901	1246	17	<u>Waldron</u>	67150

## Census Bureau Profile & Map

## Special Places in Harper County

- The Immaculate Conception church in Danville, built in 1904, somehow "fits" its location and belongs there.
- Freeport is nearly a ghost town now but the Freeport State Bank is still open. It's the smallest incorporated town in Kansas and maybe the US.
- Waldron is the second smallest incorporated city in Kansas after Freeport. The church dates from the turn of the century.
- Runnymede was founded to provide a new home for young English gentlemen and emphasized hunting and recreation. The only thing left of Runnymede is a state historical marker nearby. The old Runnymede church is now in Harper.
- There's more about the vanished town of Hamner on Blue Skyways.

## Special Events in Harper County

- The Anthony Gun Club has registered trap shoots Memorial Day, July 4th, and Labor Day. The shady grounds, beside Anthony City Lake, have been home to the club since 1938.
- There's horse and dog racing at Anthony Downs every July.
- For over 50 years, there's been an annual rodeo in Attica.

## Libraries

- **Anthony Public Library**  
624 E. Main / Anthony, KS 67003
- **Attica Public Library** (620) 254-7767  
123 N. Main / Attica, KS 67009
- **Harper Public Library** (620) 896-2959  
Tenth and Oak / Harper, KS 67058

## Museums

- **Historical Museum of Anthony** (620) 842-3852  
502 W. Main / Anthony, KS 67003

## Harper County School Systems

- **USD 361 Anthony-Harper** (620) 842-5183 Anthony
- **USD 511 Attica** (620) 254-7661 Attica

## Health Care

- **Anthony Hospital** (620) 842-5111  
1101 E Spring St. | Anthony, KS 67003
- **Attica Rural Health Clinic** (620) 254-7272  
302 N. Botkin / Attica, KS 67009
- **Harper Hospital District No 5** (620) 896-7324  
1204 Maple St. / Harper, KS 67058
- **Harper Medical Center** (620) 896-7313  
1019 Central St. / Harper, KS 67058

## Newspapers

- **Anthony Republican** (620) 842-5129  
121 E. Main / P. O. Box 31 / Anthony, KS 67003-0031
- **Attica Independent** (620) 254-7968  
115 N. Main / Attica, KS 67009
- **Harper Advocate** (620) 896-7311  
907 Central / Harper, KS 67058

## More Data About Harper County

### Economic Development

- **Harper County Economic Development Council** (620) 842-6004  
[ecodevo@harpercounty.com](mailto:ecodevo@harpercounty.com)  
PO Box 13, Anthony, KS 67003
- **University of Kansas' [County Profile Reports](#)**



*Statistical data from The Institute for Public Policy and Business  
Research*

### Health Data

- KDHE's [Harper County Health Profile](#)

### Genealogy

- Harper County [KSGenWeb](#)

### References

- WPA *The WPA Guide to 1930s Kansas* ( Lawrence: University Press of Kansas, 1984 )
- Sanders, Gwendoline & Sanders, Paul *The Harper County Story* (North Newton: Mennonite Press. 1966)

### Harper County Offices

- [Harper County Economic Development](#) (620) 842-6004  
P. O. Box 13 / Anthony, KS 67003
- [Harper County](#) (620) 842-5555  
County Courthouse / Anthony, KS 67003
- [Extension Service](#)

### For more about Harper County contact:

- [Anthony Chamber of Commerce](#) (620) 842-5456  
124½ South Bluff / P.O. Box 354, Anthony, KS(located in the courthouse)67003
- [Harper Chamber of Commerce](#) (620) 896-2511  
201 W. Main / Harper, KS(located in the courthouse)67058
- [Harper County Department on Aging](#) (620) 842-5104  
P.O. Box 462, Anthony, KS 67003 (located in the courthouse)

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August 5, 2002 / John & Susan Howell / [Wichita, Kansas](#) / [howell@kotn.org](mailto:howell@kotn.org)

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## EXHIBIT B

Searching At Reference Site  
Harper, Kansas

Reference: N. Lat. 37-18-56, W. Long. 98-04-43

CLASS = A

Channel 244 - 96.7 MHz

Call	Channel	Location		Dist	Azi	FCC	Margin
KMMZ	LIC 245C0	Enid	OK	152.06	166.9	152.0	0.06
KSKU.C	CP 246C2	Hutchinson	KS	55.10	12.1	55.0	0.10
KBBE	LIC 244A	Mcpherson	KS	119.44	17.3	115.0	4.44
ALLO	DEL 244A	Larned	KS	130.44	316.7	115.0	15.44
KGTR	LIC 244A	Larned	KS	130.44	316.7	115.0	15.44
KRZZFM	LIC 242C2	Derby	KS	80.74	56.0	55.0	25.74
KSKU	LIC 246C3	Hutchinson	KS	75.50	17.2	42.0	33.50
KKRD	LIC 297C1	Wichita	KS	71.79	44.1	22.0	49.79
KRAVFM	LIC 243C	Tulsa	OK	216.13	124.6	165.0	51.13

## EXHIBIT C

